

IRIS POUNDS, CARLTON MILLER,)
VILAYUAN SAYAPHET-TYLER,)
RHODA HALL, and PIA TOWNES, on)
behalf of themselves and all others)
similarly situated,)

V.

Defendant.

Case 1:16-cv-01395-WO-JEP Document 13 Filed 01/03/17 Page 1 of 3

4. Because of the holidays and preplanned office closures, PRA respectfully requests additional time in which to review Plaintiffs' motion. Specifically, PRA requests a fourteen (14) day extension to its deadline to respond to the Motion to Remand to State Court, making a response due on January 24, 2017.

5. Counsel for PRA has conferred with Plaintiffs' counsel on the requested extension. Plaintiffs' counsel does not object to this extension.

6. This extension of time is requested in good faith and not for purposes of delay.

WHEREFORE, defendant Portfolio Recovery Associates, LLC respectfully requests that the Court extend PRA's time for responding to the Motion to Remand to State Court for fourteen days, making the response due on January 24, 2017.

This the 3rd day of January, 2017.

ELLIS & WINTERS LLP

/s/ Jon Berkelhammer

Jon Berkelhammer

N.C. Bar No. 10246

Joseph D. Hammond

N.C. Bar No. 45657

PO Box 2752

Greensboro, NC 27402

Tel. (336) 389-5683

Fax (336) 217-4198

jon.berkelhammer@elliswinters.com

joe.hammond@elliswinters.com

*Counsel for Portfolio Recovery Associates,
LLC*

CERTIFICATE OF SERVICE

I certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification to all counsel and parties of record as follows:

Carlene McNulty, Esq.
James A. Pikler, Esq.
Emily P. Turner, Esq.
North Carolina Justice Center
P.O. Box 28068
Raleigh, NC 27611

J. Jerome Hartzell, Esq.
P.O. Box 10246
Raleigh, NC 27605

Travis E. Collum, Esq.
Collum & Perry, PLLC
P.O. Box 1739
Mooresville, NC 28115

Adrian M. Lapas, Esq.
Lapas Law Offices, PLLC
P.O. Box 10688
Goldsboro, NC 27532

This the 3rd day of January, 2017.

/s/ Jon Berkelhammer

Jon Berkelhammer